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5 Attorneys for Defendants,
Business Financial Solutions Advisory
6 LLC, Ryan Carroll, Max K. Day,
Max O. Day, Michael Day, Dreams To
7 Reality LLC, Evo Maxx LLC, HouTex
Farm Equity Partners LLC, MKD Family
8 Beneficiary, LLC, MKD Family Private
Management Company, LLC, MKD
9 Investment Advisor, LLC, Max Day
Consulting, LLC, Precision Trading
Group, LLC, Providence Oak Properties,
10 LLC, WA Amazon Seller LLC, WA
Distribution LLC, WWKB LLC, Yax
11 Ecommerce LLC, Yax IP and Management
12 Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

DAVID HOUGH; et al.,

Plaintiff,

vs.

RYAN CARROLL; et al..

Defendant

Case No.: 2:24-cv-02886-WLH

**STIPULATION TO EXTEND THE
HEARING DATE ON
DEFENDANTS' MOTION TO
DISMISS AND RELATED
DEADLINES [ECF NO. 93]**

[Declaration of Joseph R. Ashby and
[Proposed] Order filed concurrently]

Judge: Hon. Wesley L. Hsu

STIPULATION

This Stipulation is entered into by and between Plaintiffs David Hough, et al. on the one hand, and defendants Business Financial Solutions Advisory LLC, Ryan Carroll, Max K. Day, Max O. Day, Michael Day, Dreams To Reality LLC, Evo Maxx LLC, HouTex Farm Equity Partners LLC, MKD Family Beneficiary, LLC, MKD Family Private Management Company, LLC, MKD Investment Advisor, LLC, Max Day Consulting, LLC, Precision Trading Group, LLC, Providence Oak Properties, LLC, WA Amazon Seller LLC, WA Distribution LLC, WWKB LLC, Yax Ecommerce LLC, Yax IP and Management Inc., (collectively, "Defendants") on the other hand, through their respective counsel of record.

11 WHEREAS, on April 17, 2024, Lema Mousilli of LLOYD & MOUSILLI,
12 PLLC first appeared on behalf of Defendants [ECF No. 19];

13 WHEREAS, on May 20, 2024, Plaintiffs filed a First Amended Complaint
14 against Defendants [ECF No. 56];

15 WHEREAS, on July 15, 2024, Defendants filed an Amended Motion to
16 Dismiss for Lack of Jurisdiction with a hearing date scheduled for November 15,
17 2024 [ECF No. 93];

18 WHEREAS, the last day for Plaintiffs to file an opposition to Defendants'
19 Motion to Dismiss is October 25, 2024, and the last day for Defendants to file a
20 reply is November 1, 2024;

WHEREAS, on August 22, 2024, Joseph R. Ashby of Offit Kurman, PC
appeared on behalf of Defendants [ECF No. 125];

23 WHEREAS, some of the Defendants currently represented by Lloyd Mousilli
24 and Offit Kurman, PC are in the process of retaining new counsel;

25 WHEREAS, in order to preserve judicial resources and to ensure adequate
26 representation for all Defendants, the Parties have agreed, subject to the approval of
27 the Court, to extend the hearing date and related deadlines for the Motion to
28 Dismiss; 2 Case No. 2:24-cv-02886-WLH

1 WHEREAS, the Parties propose the following schedule:

2 January 10, 2025: Hearing on Defendants' Motion to Dismiss

3 December 23, 2024: Last Day for Plaintiffs to File Opposition to Motion to
4 Dismiss

5 December 30, 2024: Last Day for Defendants to File Reply in Support of
6 Motion to Dismiss

7 WHEREAS, this is the first request for extension of these dates submitted to
8 the Court by the Parties.

9 WHEREAS, the Parties enter into this Stipulation solely for the purpose of
10 continuing the hearing date and deadlines associated with the Motion to Dismiss.

11 NOW THEREFORE, based on the foregoing, the Parties, through their
12 undersigned counsel of record, hereby **STIPULATE** and **AGREE**, subject to the
13 Court's approval, as follows:

- 14 1. The hearing on Defendants' Motion to Dismiss presently set for
15 November 15, 2024 at 1:30 p.m., shall be continued to **January 10, 2024**.
16 2. The last day to file opposition shall be extended to **December 20, 2024**.
17 3. The last day to file replies shall be extended to **December 27, 2024**.

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19 IT IS SO STIPULATED.

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22 [Signatures on the following page]
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1 DATED: October 24, 2024 OFFIT KURMAN, P.C.
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By: /s/ Joseph R. Ashby
Joseph R. Ashby
Attorney for Defendants

DATED: October 24, 2024 RICHARD A. NERVIG, P.C.
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By: /s/ Richard A. Nervig (with permission)
Richard A. Nervig
Attorneys for Plaintiffs

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2), I hereby attest that all signatories listed above, and whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

DATED: October 25, 2024

/s/ Joseph R. Ashby

JOSEPH R. ASHBY

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